

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:23-cv-00103-JRG-RSP

JURY DEMANDED

UNOPPOSED MOTION TO AMEND DEADLINES

Plaintiff Headwater Research LLC (“Plaintiff”) respectfully files this Unopposed Motion to Amend Deadlines to briefly extend the deadlines to (1) comply with P.R. 3-1 and 3-2 from September 14, 2023, up to and including September 28, 2023, and (2) comply with P.R. 3-3, 3-4, and the Standing Order Regarding Subject-Matter Eligibility Contentions from November 9, 2023, up to and including November 23, 2023.

No other deadlines will be affected by this amendment. Plaintiff does not file this Motion for the purposes of delay, but rather so that justice may be done. Counsel for Defendants have met and conferred with counsel for Plaintiff, and do not oppose this relief.

Accordingly, the Parties respectfully request that the Court grant this Unopposed Motion to amend the deadlines in the Court’s Order setting a scheduling conference (Dkt. 41) as follows:

| Original Date | Amended Date | Event |
|--------------------|---------------------------|---|
| September 14, 2023 | September 28, 2023 | Comply with P.R. 3-1 & 3-2 (Infringement Contentions) |
| November 9, 2023 | November 23, 2023 | Comply with P.R. 3-3 & 3-4 (Invalidity Contentions) and Comply with Standing Order Regarding Subject-Matter Eligibility Contentions |

Date: September 27, 2023

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically. I further certify that all counsel of record were served a complete and accurate copy of the document via email on this day.

Dated: September 27, 2023

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff in accordance with Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Marc Fenster
Marc Fenster